

EXHIBIT C

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1 LAW OFFICE OF DANIEL MARKS
2 DANIEL MARKS, ESQ.
3 Nevada State Bar No.: 002003
4 NICOLE M. YOUNG, ESQ.
5 Nevada State Bar No. 12659
6 610 South Ninth Street
7 Las Vegas, Nevada 89101
8 Office@danielmarks.net
9 *Attorneys for Plaintiff*

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 PARNELL COLVIN,
13 Plaintiff,

Case No. 2:20-cv-01765-APG-EJY

14 v.

15 M.J. DEAN CONSTRUCTION, INC,
16 Defendant,

17 **PLAINTIFF'S SECOND SUPPLEMENTAL DISCLOSURE**

18 Plaintiff Parnell Colvin, by and through his counsel Daniel Marks, Esq., and Nicole M.
19 Young, Esq., of the Law Office of Daniel Marks, in accordance with FRCP 26 and LR 26-1, hereby
20 supplements his discovery disclosures as follows:

21 **I. List of Witnesses**

- 22 1. Parnell Colvin, Plaintiff,
23 c/o Law Office of Daniel Marks
24 610 South Ninth Street
25 Las Vegas, Nevada 89101

26 Mr. Colvin is expected to testify to, including but not limited to, the facts and allegations in
27 the Complaint on file herein.

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2. John Thomason
Kevin Gutierrez
Dave Muti
Person(s) Most Knowledgeable
c/o Robert L. Rosenthal, Esq.
Howard and Howard Attorneys, PLLC
3800 Howard Hughes Parkway
Las Vegas, Nevada 89169

These witnesses are expected to testify regarding the facts and allegations in the Complaint on file herein.

Plaintiff reserves the right to supplement this list of witnesses as discovery continues.

Plaintiff reserves the right to call on any witnesses named by Defendant.

II. List of Documents

1. Documents submitted to EEOC, attached hereto at Bate Stamp COLVIN 00006-11.
2. Documents regarding Plaintiff's job search, attached hereto at Bate Stamp COLVIN 00012-81.
3. Text messages regarding job search, attached hereto at Bate Stamp COLVIN 00082-91.
4. Screen shot of Plaintiff's unemployment benefits, attached hereto at Bate Stamp COLVIN 00092.
5. Tax documentation from 2017 to 2019, attached hereto at Bate Stamp COLVIN 00093-102.
6. Laborers 2018-2023 Master Labor Agreement, attached hereto at Bate Stamp COLVIN 00103-145.
7. Text messages between Plaintiff and John Thomason, attached hereto at Bate Stamp COLVIN 00146-156.
8. Laborers' International Union of North America Daily Dispatch Report dated April 29, 2020 and May 7, 2020, attached hereto at Bate Stamp COLVIN 00157-158.
9. M.J. Dean Construction, Inc., Employee Incident Investigation Report, dated November 14, 2019, attached hereto at Bate Stamp COLVIN 00159-162.

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1 Plaintiff reserves the right to supplement this list as discovery continues.

2 Plaintiff reserves the right to rely on any documents produced by Defendant in this matter.

3 **III. Damage Calculation**

4 Plaintiff is seeking back pay, which currently totals \$191,466, as well as front pay. In
5 addition, Plaintiff seeks compensatory damages, according to proof at trial, for pain and suffering,
6 including humiliation, embarrassment, and emotional distress he suffered as a result of the race
7 discrimination and retaliation for objecting to that discrimination resulting in the termination of
8 employment at issue. Plaintiff is also entitled to an award of attorney's fees and costs of suit.

9 Plaintiff reserves the right to amend and/or supplement his damage calculation.

10 DATED this 8th day of July, 2021.

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12 LAW OFFICE OF DANIEL MARKS

13 /s/ Nicole M. Young

14 DANIEL MARKS, ESQ.

15 Nevada State Bar No. 002003

16 NICOLE M. YOUNG, ESQ.

17 Nevada State Bar No. 12659

18 610 South Ninth Street

19 Las Vegas, Nevada 89101

20 Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the LAW OFFICE OF DANIEL MARKS, and that on the 8th day of July, 2021, I did deposit in the United States Post Office, at Las Vegas, Nevada, in a sealed envelope with first class postage fully prepaid thereon, and deliver via e-mail a true and correct copy of the above and foregoing **PLAINTIFF'S SECOND SUPPLEMENTAL DISCLOSURE**, upon the Defendant at the following:

Martin A. Little, Esq.
Robert L. Rosenthal, Esq.
HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes Parkway, Suite 100
Las Vegas, Nevada 89169
Attorneys for Defendant

/s/ Jessica Flores

An employee of the
LAW OFFICE OF DANIEL MARKS